

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

JANE DOE,

Plaintiff,

Federal Action No. 1:23-cv-23497-BB

v.

MIAMI GARDENS SQUARE ONE,
INC., *individually and d/b/a* TOOTSIE'S
CABARET MIAMI,

Defendant.

PLAINTIFF'S MOTION FOR LEAVE FOR CONVENTIONAL FILING

Plaintiff Jane Doe (the "Plaintiff"), files this Motion for Leave for Conventional Filing via personal delivery to chambers, Plaintiff's Trial Exhibit 7 for use at Trial.

1. Pursuant to the Rules of the Southern District of Florida, this Court requires leave of court for the conventional filing of documents that cannot be scanned. S.D. Fla. Local Rule 5.1 and CM/ECF Next Gen Administrative Procedures 4A.

2. The Parties in this matter, in conjunction with their Joint Pretrial Stipulations, filed their Joint Exhibit List and each Parties' respective Exhibit List on January 13, 2025, pursuant to the Court's Order Scheduling Trial. *See D.E. 83 and 57.*

3. Subsequently, the Parties appeared before the Court on January 21, 2025 for the pre-trial Calendar Call, at which time the Parties were instructed to file a copy of all Exhibits with the Court no later than Friday, January 24, 2025.

4. As part of Plaintiff's Exhibit List and consequential to the issues in this case is a video that shows the physical marks and bruises on her body. Plaintiff intends to use this video as

Exhibit 7 at the time of trial.

5. Plaintiff respectfully requests that the Court enter an Order Granting Plaintiff's request and the filing of Plaintiff's Trial Exhibit 7 shall be filed conventionally via in person delivery no later than close of business on Friday, January 24, 2025.

DATED: January 23, 2025.

Respectfully submitted,

Derek Smith Law Group, PLLC
Counsel for Plaintiff

/s/ Caroline Miller (by permission)

Caroline H. Miller, Esq.
Florida Bar No. 1012331
520 Brickell Key Drive, #O-301
Miami, Florida 33131
Tel: (305) 945-1884
Fax: (305) 503-6741
caroline@dereksmithlaw.com

CERTIFICATE OF SERVICE

I certify that I served this instrument in compliance with the Federal Rules of Civil Procedure on January 23, 2025.

/s/ Benjamin W. Allen

Gary S. Edinger, Esquire
Florida Bar No. 0606812
BENJAMIN, AARONSON, EDINGER
& PATANZO, P.A.
305 N.E. 1st Street
Gainesville, Florida 32601

WALLACE & ALLEN, LLP
440 Louisiana, Ste. 590
Houston, Texas 77002
Telephone: (713) 227-1744
Facsimile: (713) 600-0034

Benjamin W. Allen
(admitted pro hac vice application)
ballen@wallaceallen.com
Texas Bar No. 24069288
PHV No. 1023863

ATTORNEYS FOR DEFENDANTS

/s/ Caroline H. Miller

Caroline H. Miller, Esquire